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December 21, 2022

Hon. J. Paul Oetken
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

**Re: United States v. Nunez et al.
22-CR-293 (JPO)**

Dear Judge Oetken:

I am the assigned counsel for **Yorkis Chevalier**, a defendant in the above-captioned case. I write today to request modifications to Mr. Chevalier's bail conditions.

Mr. Chevalier was arrested on August 24, 2022, and was released on a \$75,000 bond signed by three financially responsible persons with home detention location monitoring. Mr. Chevalier resides at 124 Fort George Avenue, Apt. G in upper Manhattan. He resides there with Genesis Ventura (a bond signer) and their two children, ages 3 and 5. Ms. Ventura's father (also a bond signer) is the superintendent of the building and resides with his wife in an apartment next door to the defendant's apartment. Ms. Ventura's sister also has an apartment in the same building.

On October 13, 2022, Pretrial Services allowed the defendant to work as a handyman helper to his father-in-law at the apartment building where he resides. On November 22, 2022, the Court granted Mr. Chevalier permission to attend Thanksgiving dinner at his father- and

mother-in-law's home and to attend two birthday celebrations for his six-year-old son. Mr. Chevalier and his family greatly appreciated the Court's consideration.

I now respectfully write to the Court on his behalf to request the following modifications to the terms of his bail conditions:

First, Mr. Chevalier requests to be permitted to attend Christmas dinner at his father- and mother-in-law's apartment next door on Sunday, December 25 from 7:00 pm until 11:00 pm.

Second, he requests to be permitted to ring in the New Year at his father- and mother-in-law's apartment next door from 7:00 pm on December 31, 2022 until 12:30 am on January 1, 2023.

Pretrial Services has confirmed that Mr. Chevalier remains compliant with all conditions of his release. However, Pretrial Services does not consent to these modification requests because it is their office policy to object to leaves for social gatherings. The Government takes no position.

Thank you for your consideration of these modifications and for continued courtesies to counsel.

Granted.
So ordered.
12/21/2022

Respectfully submitted,

/s/
Richard H. Rosenberg, Esq.



J. PAUL OETKEN
United States District Judge